

Overseas Gaming Management N.V.

Player Complaints Procedure

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Version Control

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A.Cacciattolo	09.07.2025	Creation in line with GCB regulations	1.0

Change and Review History

Version	Date	Description of Changes	Reviewed/Approved By
1.0	10.07.2025	Policy Creation and Approval	Head of Compliance
			PYGG B.V., Director



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1 Introduction

Overseas Gaming Management N.V. ("the Company") is dedicated to resolving all player complaints and disputes through a process that is fair, efficient, and transparent. These procedures have been established in full compliance with the regulatory framework governing B2C license holders operating under the jurisdiction of Curacao. The objective is to ensure that all player issues are handled consistently and impartially.

The dispute resolution process is outlined clearly within the Company's Terms & Conditions. All personnel involved in handling complaints undergo thorough training to ensure that every case is managed in full compliance with relevant legal obligations and the Company's dedication to maintaining exceptional customer service standards.

2 Complaints Handling Procedure

2.1 Lodging a Complaint

Players may lodge a formal complaint with the Company by sending an email to:

- support@wmgames.com

Only the registered account holder may submit a complaint, and the submission must include the following information to ensure proper assessment and resolution:

- Full name and the email address registered to the account
- Username and/or player account ID
- A clear and detailed explanation of the issue or dispute
- The date and time the incident occurred
- Any relevant documentation or evidence that supports the claim

The Company reserves the right to decline processing complaints that are submitted anonymously or lack sufficient information. However, if enough detail is provided to accurately identify the account and the nature of the issue, such complaints may still be reviewed at the Company's discretion.

In addition to email, players may also raise complaints through our available customer support channels, including live chat or direct message via the website. All complaints will be handled in accordance with the Company's internal procedures and applicable regulatory requirements.

2.2 Acknowledgement and Timelines

Overseas Gaming Management N.V., as a licensed operator under the laws of Curacao, is dedicated to handling all player complaints promptly and fairly, in accordance with applicable regulatory requirements. Complaints that involve matters of responsible gaming are treated with heightened importance, given their potential implications for player well-being and the Operator's duty to promote safe and sustainable gaming practices. These cases are prioritised to ensure that any risks to the health, safety, or financial security of players are addressed without delay.

Responsible Gaming Complaints

Overseas Gaming Management N.V., operating under a Curaçao gaming licence, places utmost importance on complaints that relate to responsible gaming. Such complaints include, but are not limited to, alleged failures to process self-exclusion or cooling-off requests in a timely manner, or concerns regarding the adequacy of the Company's interactions with players exhibiting signs of gambling-related harm or vulnerability.

Given the potential impact on player welfare, these complaints are treated as high priority and are addressed with the urgency and care they warrant. The Company will make every reasonable effort to investigate and resolve such matters within five (5) business days from the date of receipt.

To ensure transparency and effective communication throughout the complaints process, the Company will, within two (2) business days of receiving a responsible gaming-related complaint:

- Formally acknowledge receipt of the complaint in writing;
- Provide a clear explanation of the procedure that will be followed to assess and resolve the issue; and
- Communicate an estimated timeframe for resolution.

If further time is reasonably required to ensure a fair, thorough, and well-informed decision, the complainant will be notified accordingly. Any such extension shall not exceed an additional two (2) weeks, except where delays arise as a result of incomplete, missing, or delayed information from the complainant. In such cases, an extra extension of up to two (2) weeks may be granted, during which the Company will maintain regular communication to keep the player informed of the progress.

All Other Complaints

The Company is committed to the fair, consistent, and timely handling of all player complaints, including those not directly related to responsible gaming. For general complaints such as disputes over game outcomes, account transactions, bonus terms, or

technical issues the Company strives to investigate and resolve the matter within four (4) weeks from the date the complaint is received.

In instances where the issue is particularly complex such as those involving technical investigations, third-party verification, or the need for further documentation—this timeframe may be extended once, for a maximum additional period of four (4) weeks. The player will be informed in writing of any such extension, along with the reasons for the delay and the revised estimated resolution date.

To promote transparency and clear communication, the Company will, within one (1) week of receiving a general complaint:

- Send a written acknowledgment confirming receipt of the complaint.
- Outline the steps that will be taken to review and address the issue.
- Provide an initial estimate of the timeframe required to reach a resolution.

This structured approach reflects the Company's commitment to regulatory compliance, operational integrity, and high standards of customer service. It ensures that all complaints are handled with diligence and professionalism, while maintaining the trust and confidence of our player community.

2.3 Internal Handling Process

The Company as a licensed operator under the laws of Curacao, maintains a comprehensive, documented, and auditable internal complaints handling procedure. This process is designed to ensure that all player complaints are managed efficiently, transparently, and in full compliance with the applicable regulatory obligations, while also upholding the highest standards of customer protection and operational integrity.

Complaints Logging

All complaints submitted by players are promptly recorded in a secure, centralised complaint management system. Each entry includes the following information:

- Verified player identification details
- Date and time of complaint submission
- Summary of the issue raised
- Designated complaints handler
- Status updates throughout the investigation
- Final resolution and outcome

Categorisation and Prioritisation:

Upon receipt, each complaint is assessed and classified based on objective criteria to determine the appropriate level of urgency and attention. Factors considered include:

- The potential impact on the player's well-being or gaming experience.
- The financial magnitude of the issue.
- Indications of possible breaches of the operator's licence conditions or consumer protection standards.

Priority is given to complaints involving responsible gaming, financial disputes, and potential violations of regulatory obligations.

Investigation:

Where a complaint requires detailed examination, it is assigned to trained and impartial personnel for thorough review. The investigation process may involve:

- Conducting a root cause analysis to identify underlying issues.
- Consulting relevant internal departments (e.g., compliance, technical, payments).
- Reviewing relevant data such as gameplay logs, transaction histories, communication records, and account activity.

All investigations are carried out objectively and with a view to reaching a fair, evidence-based conclusion.

Escalation Procedure:

Complaints may be escalated internally to senior management or specialist teams if:

- They involve complex technical, legal, or regulatory matters.
- The complaint remains unresolved following initial assessment.
- There is a potential risk to player safety, systemic failure, or reputational harm.
- The complaint may warrant reporting to the regulator or third-party service providers.

Escalation ensures that complex or high-risk matters are reviewed at the appropriate level of authority within the organisation.

Resolution and Communication:

Following completion of the review, the Company will:

- Provide the player with a clear and reasoned written decision.
- Explain the findings and any supporting evidence considered.
- Offer corrective measures or compensation, where justified by the facts and internal policies.
- Advise the player of any available escalation or recourse options, including the possibility to refer the matter to an external dispute resolution mechanism or the relevant regulatory authority, where applicable

3 External Dispute Resolution

In the event that a player remains dissatisfied with the final outcome of their complaint after it has been reviewed and concluded by Overseas Gaming Management N.V., the player has the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity for further consideration.

The Company's designated ADR provider is:

- CADRE B.V.

The ADR process offers players an impartial, transparent, and cost-free avenue for the resolution of disputes that could not be settled through the internal complaints procedure. While participation in the ADR process is entirely voluntary, it is strongly encouraged as a practical and efficient alternative to initiating formal legal proceedings.

4 Curacao Gaming Authority (CGA) Notifications

Overseas Gaming Management N.V. operates under the regulatory oversight of the Curacao Gaming Authority (CGA), which serves as the competent authority for ensuring compliance with applicable gaming laws and protecting player rights.

If a player remains unsatisfied with the resolution of their complaint either following the completion of the Company's internal complaints procedure or after engaging with the appointed Alternative Dispute Resolution (ADR) provider they may choose to escalate the matter directly to the CGA for further review.

While the CGA provides an avenue for regulatory oversight and intervention in unresolved disputes, players are strongly encouraged to first exhaust both the internal complaint handling procedure and the ADR process. These mechanisms are designed to facilitate timely, fair, and cost-free resolution of player concerns and are often the most efficient path to resolving issues.

Overseas Gaming Management N.V. is fully committed to cooperating with the CGA in any such cases and will provide all relevant documentation and information as required by the Authority.

5 Record Keeping and Reporting Obligations

In line with the requirements established by the Curaçao Gaming Authority (CGA), Overseas Gaming Management N.V. is committed to maintaining transparent, accurate, and timely

reporting of all player complaints. To this end, the Company will submit biannual complaint reports to the CGA no later than January 15th and June 15th of each calendar year.

Each report will contain a comprehensive overview of the Company's complaint handling activities during the relevant reporting period, including:

- The total number of complaints received.
- The number of complaints resolved, with clear distinction between those upheld and those dismissed.
- The number of complaints pending resolution as of the reporting date.
- A detailed breakdown by complaint category (e.g., responsible gaming, financial disputes, technical issues).
- The number of complaints escalated to the designated Alternative Dispute Resolution (ADR) provider, CADRE B.V.
- Any instances where legal proceedings were initiated by or against the Company in relation to a complaint.

The Company will cooperate fully with the decisions of the ADR body and remain proactive in implementing any applicable regulatory changes issued by the CGA. Where necessary, the Company will also support the ADR provider in meeting its own reporting obligations under the CGA's ADR Framework.

To ensure accountability and regulatory oversight, all records related to complaints especially those that remain unresolved, have been referred to ADR, or have escalated to legal proceedings will be retained for a minimum period of five (5) years, or longer where required by applicable data protection laws or legal retention mandates.

The CGA reserves the right to request access to the Company's complaint records at any time for the purpose of regulatory review, audit, or investigation. Overseas Gaming Management N.V. is committed to full compliance and cooperation in such matters.

6 Continuous Improvement

Overseas Gaming Management N.V. is committed to the ongoing enhancement of its complaints management framework, recognising that effective handling is essential to maintaining player trust, regulatory compliance, and a culture of fairness.

As part of this commitment, the Company regularly reviews and refines its procedures, including:

- Analysing complaint trends and resolution outcomes to identify recurring issues.
- Addressing root causes to prevent repeat incidents.

- Updating internal processes and external communications to promote clarity, transparency, and alignment with evolving standards.

To support these efforts, the Company conducts regular staff training and awareness programmes aimed at:

- Ensuring familiarity with the latest requirements from the Curaçao Gaming Authority (CGA).
- Strengthening understanding of responsible gaming duties and identifying vulnerable players.
- Embedding best practices for customer service, dispute resolution, and player protection across the organisation.

Through this proactive approach, Overseas Gaming Management N.V. continues to foster a safe, fair, and player-focused gaming environment.